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December 21, 2000

Mr. Francis X. Lyons
Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604



Re: **June 19, 2000 CERCLA Section 105(d) Petition Regarding Slips in the Calumet River**

Dear Mr. Lyons:

International Truck and Engine Corporation, formerly Navistar International Transportation Corp., ("International") respectfully submits the enclosed response to a June 19, 2000 petition (the "Petition") filed with your office by the Chicago Legal Clinic ("CLC"). The Petition, submitted pursuant to CERCLA Section 105(d), requests a Preliminary Assessment ("PA") of four barge Slips in southeastern Chicago along the Calumet River. Two of these Slips are adjacent to property owned in trust by International. The Petition contends that International is responsible for alleged contamination in the Slips. International disputes that the Slips pose a threat to the Petitioners and, as a result, asserts that the Petition should be denied.

We appreciate the opportunity to provide you with this response and urge you to consider it when evaluating the Petition. If you have any questions, or wish to discuss this matter further, please contact me.

Sincerely,

International Truck and Engine Corporation

Edith M. Ardiente, PE, QEP
Vice President, Environmental Affairs

Enclosure (1)
cc: Bruce Everetts, Illinois EPA

**INTERNATIONAL TRUCK AND ENGINE CORPORATION'S
RESPONSE TO JUNE 19, 2000 CERCLA SECTION 105(d) PETITION
REGARDING SLIPS ADJACENT TO THE WISCONSIN STEEL WORKS SITE**

International Truck and Engine Corporation, formerly Navistar International Transportation Corp., ("International") respectfully submits the following response to the Chicago Legal Clinic's (the "CLC") June 19, 2000 petition (the "Petition"). The Petition, submitted on behalf of ten clients (the "Petitioners") pursuant to CERCLA § 105(d) concerns the Slips adjacent to the former Wisconsin Steel Works site ("WSW Site" or the "Site").

INTRODUCTION

The Petition requested that the United States Environmental Protection Agency (the "USEPA") undertake a Preliminary Assessment ("PA") of four Slips located on the Calumet River in Chicago. Two of these Slips are adjacent to the WSW Site, held in trust by International. The USEPA initially responded to the Petition by requesting that the Illinois Environmental Protection Agency ("Illinois EPA") conduct sediment sampling. The sediment sampling was conducted on November 13-14, 2000. As a stakeholder in the outcome of the USEPA's decision, International believes that this response by the USEPA was unnecessary, that the completion of a PA is unwarranted, and that the Petition should be denied insofar as these two Slips are concerned.¹ These Slips pose no significant risk to human health, to the environment, or to the Petitioners – on these bases alone, relief should be denied. Moreover, the information relied upon by the Petitioners is incomplete, subjective, and does not support their Petition. In fact, the remedy suggested by the Petitioners – highly expensive and extensive dredging – may be counterproductive. The suggested remedy is not supported by the information relied upon by the Petitioners. Indeed, even if the Illinois EPA's current testing

¹ International is not providing comment regarding the other two Slips which are adjacent to the United States Steel South Works Site.

reveals sediment contaminant levels that in USEPA's opinion are problematic, a Feasibility Study ("FS") should be conducted to determine whether any further action is necessary. Finally, if the USEPA grants the Petitioners' request, the Petitioners ignore several potentially responsible parties who should be notified and involved in any action required by the USEPA.

APPLICABLE LEGAL AUTHORITY

CERCLA §105(d) allows any person who is, or may be affected by a release or threatened release of a hazardous substance to petition the federal government to conduct a PA of the alleged hazards to public health and the environment. 42 U.S.C. § 9605(d). Under 40 C.F.R. § 300.420(b)(5) and CERCLA §105(d), within 12 months after a PA petition is received, the USEPA must send a report to the petitioner describing whether the petition was approved or not and the reasons for the decision. When determining if a PA should be conducted the USEPA is to consider "whether there is information indicating that a release has occurred or there is a threat of a release of a hazardous substance, pollutant, or contaminant" and whether the USEPA has the legal authority under CERCLA to respond to the Site. 40 C.F.R. § 300.420(5)(iv). As a prerequisite for the USEPA to approve a PA petition, the petitioners must "provide enough information to make the person reviewing the petition suspect that an actual/potential release may exist that affects the petitioners." EPA Office of Solid Waste and Emergency Response ("OSWER"), OSWER Directive dated Feb. 5, 1990, 1990 WL 608660.

The Petition should be denied. The quality of the sediments in the Slips adjacent to the WSW Site do not affect the Petitioners, and the recommended remedy is not supported by the data or the analysis provided by the Petitioners.

FACTUAL BACKGROUND

A. The Wisconsin Steel Works Site

The WSW Site covers approximately 176 acres and is located in southeastern Chicago in Hyde Park Township, Cook County. The address of the Site is 2701 E. 106th Street, Chicago, Illinois, 60617. The Site is currently being investigated and remediated pursuant to a Consent Order with the State of Illinois dated December 30, 1996 (the "Consent Order"). There has been no manufacturing activity at the Site since 1980.

Prior to 1980 the WSW Site operated as a fully-integrated steel manufacturing facility. For 127 years, the facility was operated (at various levels of production) by numerous owners. International's predecessors owned and operated the Site for over 100 of these years. Beginning in 1981 the Site was transferred into an American National Bank Land Trust, No. 109903-07 (the "Trust"). From 1981 through 1994, the U.S. Department of Commerce Economic Development Administration (the "EDA") owned 90% of the Trust; International owned the remaining 10%. In September 1994, International entered into a settlement agreement with the EDA in which International assumed a 100% ownership interest in the Trust and agreed to enroll the Site into the Illinois Site Remediation Program (the "SRP"). International also agreed to waive its ability to withdraw from the SRP and agreed to enter into the Consent Order. *See* Settlement Agreement at ¶ 20. The Site is to be remediated under an industrial land-use standard. *See* Settlement Agreement at ¶ 20; Consent Order at ¶ 2.c. .

Pursuant to the Statement of Work ("SOW")² contained in the Consent Order, International conducted an extensive investigation of the Site. Prior to the SOW, in the 1980s and 1990s, the Site was studied by numerous entities primarily under the direction of the USACE. An addendum listing the investigative reports and documentation regarding the WSW Site is attached hereto as Exhibit A. The documents listed therein are voluminous and have not been included in this response. They are, however, available upon request.

B. North And South Barge Slips

Two of the four barge Slips complained of in the Petition are adjacent to the WSW Site. They are not, nor have ever been, owned by the Trust, or, to the best of our knowledge, by any other party with a prior ownership interest in the Site. As such, the barge Slips are not subject to the Settlement Agreement or Consent Decree.³ The Slips were, however, used by International and every prior owner during the time the Site was operated as a steel mill.⁴

As mentioned, International was not the sole user of these Slips. The South Slip, for example, was used by the predecessor of the Acme Steel Company, Interlake Iron Corporation. Aerial photographs from 1949 and 1958 show what appears to be a coal delivery

² The SOW, based on a plan prepared by the United States Army Corps of Engineers (the "USACE") in December 1993, was approved in October 1995 by the Illinois EPA.

³ The north barge slip, (sometimes referred to as the Wisconsin slip by Petitioners) is approximately 1,227 feet long by 180 feet wide and runs east-west through the middle of the site (the "North Slip"). It has sheer walls with water depths ranging from 12 to 25 feet. The south barge slip (sometimes referred to as the Semet-Solvay slip by petitioners) is approximately 964 feet long by 174 feet wide and runs east-west at the southern boundary (the "South Slip" and together with the North Slip, the "Slips"). The banks are sheer except in the immediate vicinity of the Acme Steel outfall, where the bank has slumped, creating a shallow shoreline area approximately 500 feet long. With the exception of this one shallow area, water depth ranges from 10 to 25 feet.

⁴ The Slips were primarily used for the delivery of raw materials to the Site; the North Slip was primarily used for delivery and off-loading of limestone and iron ore and the South Slip was primarily used for the delivery and off-loading of coal.

and off-loading operation south of the South Slip on the Interlake property. Sometime after 1961, Interlake ended its coal delivery and off-loading operations at the South Slip. In 1962, International acquired property southwest of the South Slip from Interlake Iron Corporation, which continued to own the property along the southern bank of the South Slip. To ensure its continued access to the South Slip, Interlake reserved the right, title, and interest to the south half of the South Slip. *See* Deed from Interlake to International Harvester Company, recorded December 21, 1962.

International does not currently use either Slip and has not done so since 1980. Indeed, the North Slip is currently inactive. The South Slip, on the other hand, is used by other companies. Acme Steel is currently discharging process water to the South Slip. Calumet River Fleeting, Inc. has been using the South Slip for barge storage for at least five years. Heckett Multiserve, a slag aggregate and distribution operation, occupies the property south of the South Slip.

ARGUMENT

A. The Slips Pose No Significant Risk to the Petitioners or the Environment

Despite never owning the Slips adjacent to the Site, despite not using them for raw materials handling in nearly twenty years, and despite the fact that the Slips are not part of the Trust property and were therefore not included within the scope of the Consent Order, International independently evaluated the Slips in December 1999. International analyzed sediment, surface water, and fish tissue data collected by the United States Fish and Wildlife Service (the “USFWS”) and the Illinois EPA. *See* Ecological Risk Assessment (“ERA”) completed by ARCADIS Geraghty & Miller, December, 1999, attached hereto as Exhibit B. The ERA was prepared for the community as International’s response to questions surrounding slip

sediment quality. Like all other reports and documents surrounding the investigation and cleanup of the WSW Site, the ERA was placed in local information repositories for public review.⁵ The ERA concludes that the Slips adjacent to the Site do not pose a risk or imminent hazard to human health or the environment. Based on this independent evaluation, the Petition should be denied.

The ERA evaluated the risks associated with exposure to chemical constituents detected in sediment, surface water, and fish tissue. The ERA was conducted using multiple lines of evidence including media-specific criteria comparisons, evaluation of the potential toxicity of polycyclic aromatic hydrocarbon ("PAH") mixtures, correlation analyses of toxicity test results, and analysis of potential food-web exposures based on the data available from the USFWS (reported in 1994) and the Illinois EPA (reported in 1996). The assessment procedure used in the ERA is consistent with USEPA guidelines.

The ERA indicates that organic compounds are present in the sediments of the Slips at concentrations above background and regional toxicity guidance values. These concentrations, however, do not pose a significant risk or imminent hazard to aquatic receptors or piscivorous birds that utilize the Slips for habitat or foraging. Furthermore, the Petitioners' argument that they are "affected" by a release of a hazardous substance (as that word is used in CERCLA § 105(d)) is tenuous at best. The Slips are surrounded by acres of industrial property

⁵ From its inception, International's environmental project at the WSW site has been supported by a community relations plan. International maintains a mailing list of approximately 1,000 interested parties who receive newsletters and notices of key project milestones. Project information continues to be available to the broader community through project press releases, published public notices, informational distributions, and presentations made to community groups.

Throughout the process, International's interactions with the community have been open and positive. With regard to the Phase II Remedial Investigation, for example, area residents have expressed significant support for the technical process and International's community relations efforts.

and are not used in ways that would remotely encourage human recreational exposure to sediments, water, or resident biota. There is simply no viable threat to the Petitioners.

Moreover, although several metals were present in sediment taken from the Slips at concentrations above background levels and toxicity screening values, the available data and lines of evidence evaluated do not indicate that metals are likely to pose a significant risk. First, metals were not detected in the surface water samples at concentrations exceeding the chronic surface water quality criteria. Second, the toxicity observed in the fat head minnow toxicity test conducted by the USFWS can be attributed to unionized ammonia, not to the elevated levels of metals referred to in the Northwestern Study and found in the Slips' sediments. Finally, metals were not detected at elevated levels in fish tissues and the associated risks to piscivorous birds appear to be negligible. Therefore, the presence of metals does not appear to be associated with any adverse effects on aquatic or avian receptors at the Slips.

Petitioners ignore the ERA and rely instead on an assessment of the Slips by the Northwestern University Department of Civil Engineering prepared solely for the purpose of supporting the Petition.⁶ See A Characterization and Assessment of Vessel Slip Contamination: United States Steel South Works Site and Wisconsin Steel Works Site (the "Northwestern Report"). Unfortunately, the Northwestern Report introduced no new data and selectively ignored existing information, so as to support the sought-after conclusion that the Petition should be granted and the Slips dredged. Accordingly, the Northwestern Report should be disregarded.

⁶ The Northwestern Report states that the assessment was prepared in response to the Petition for a PA. However, logic suggests that the Petition should have been based on the findings of the assessment, rather than the assessment being prepared in support of the Petition. The issue of timing and motive for preparation speaks to the independence of the study. The way in which the Northwestern Report purports to bolster the Petitioners' request for dredging, both subsequent to the drafting of the Petition and without the completion of a feasibility study, is neither sensible nor objective.

First, the Northwestern Report did not consider any new data. Instead, it merely points out what it sees as the limitations of the existing data set and subsequently recommends additional ecological studies to fill in the gaps. Second, the Northwestern Report ignores much of the information available to the Petitioners at the time they filed the Petition. For example, the final version of the Preliminary Risk Assessment dated October 1998 and the Ecological Risk Assessment dated December 1999, were not referenced in the Northwestern Report or the Petition. The only International study referenced by the Petitioners and the Northwestern Report is the *Draft* Preliminary Risk Assessment dated March, 1998. The Final Preliminary Risk Assessment and the Ecological Risk Assessment addressed issues raised from public comment on the *Draft* Preliminary Risk Assessment. Many of the issues raised in the Petition were these same issues raised earlier, and were addressed in the Final Preliminary Risk Assessment and the Ecological Risk Assessment. The conclusion reached by the Northwestern Report is flawed by its failure to study all of the existing information.

The Northwestern Report also contains many technical flaws including: the improper selection of benchmarks for screening criteria; the improper use of only maximum detected concentrations and not central tendencies of the data; and the consideration of risks of chemicals that were never detected in the sediment.

The Northwestern Report is also unable to support any claim by Petitioners that they are at risk from the Slips adjacent to the Site. Indeed, even accepting the conclusion of the Northwestern Report, the only identified potential threat to humans might be fisherman or those who ingest fish caught near the Slips. Even so, the Northwestern Report specifically concludes that “the carcinogenic and noncarcinogenic risks to anglers exposed to vessel slip surface waters or contaminated fish were insignificant.” See Northwestern Report, Executive Summary, p. iii.

As a result, the Northwestern Report itself supports a denial of the Petition on the grounds that there is no release or threatened release that affects the Petitioners.⁷

B. Dredging the Slips is Not Advisable and May be Counterproductive

While International has stated its position that the Slips do not pose a substantial risk to human health and the environment, should USEPA find otherwise, dredging sediments in the Slips, as recommended by the Petitioners, may not be the appropriate remedy. Prior to implementation of a remedy, the CERCLA process requires that an FS be completed; in an FS, a variety of remedial alternatives are considered. The Petitioners did not complete an FS prior to recommending dredging. International did not complete an FS because the findings of the ERA indicated that an active remedial response was not necessary.

It is our understanding that some of the undesired effects of dredging, such as disturbance of the sediment resulting in mobilization and waste management issues, need to be considered. Additionally, the improved quality of the Slips would have to be considered within the context of the Calumet River system as a whole, as sediments in the Calumet River may be deposited in the Slips following a dredging activity. Neither the Petition nor the Northwestern Report address these important issues. Additionally, the Petition and the Northwestern Report do not consider any remedial alternatives other than dredging.

While International does not believe that any type of remedy is warranted, should the USEPA find otherwise, International would expect that remedy selection consider the issues above.

⁷ International does not dispute that Chicago residents live in the proximity of the WSW Site. Such residents' exposure to the Slips, however, is extremely remote.

C. USEPA Should Notify Other Potentially Responsible Parties If It Grants The Petition.

Even if the Petition is granted (which it should not be), there are several potentially responsible parties who should be notified.⁸ These include, without limitation:

- Acme Steel – Acme Steel is a steel manufacturing facility, with its primary facilities located southwest and northeast of the South Slip. Aerial photographs indicate that Acme Steel used the south bank of the South Slip to receive and off-load coal and/or other raw materials. Acme Steel continues to discharge process water to the South Slip.
- Calumet River Fleeting, Inc. – Calumet River Fleeting, Inc. operates tug boats that move barges in the Calumet River system. Through an agreement with Heckett Multiserve, they frequently use the South Slip for temporary storage of barges.
- Heckett Multiserve – Heckett Multiserve is a slag aggregate handler occupying the property south of the South Slip. It is not known if Heckett Multiserve uses the South Slip for its commercial activity.
- The Economic Development Administration – The EDA owned 90% of the Trust from 1981 to 1997. By virtue of having property ownership while the steel making operations were in process of shut down, the EDA would be a potentially responsible party associated with any determinations relating to the Slips.

Even concerned members of the community surrounding the WSW Site recognize that International should not be held solely responsible for the Slips. At the invitation of the

⁸ International does not admit that it is a potentially responsible party. It has, however, voluntarily cooperated with the community and government agencies to understand any potential environmental issues associated with the Slips.

community, International representatives observed many Center for Neighborhood Technology (“CNT”) meetings in the community regarding the Site. At one such meeting, the CNT suggested to the community the development of a petition to the USEPA regarding the Slips. The Chicago Department of Environment was requested to lead the effort, but declined. International noted that establishing a comprehensive list of potentially responsible parties was consideration that needed to be addressed. Just as important, a set of appropriate remedies needed to be determined, including a no action alternative. Repeatedly in the group discussions, the community representatives indicated that International would not be singularly targeted simply because it was present in the community and was currently investigating and remediating the Site.

The CLC, on behalf of the Petitioners, has unfairly singled out International as the sole party associated with these two Slips. By doing so, the Petitioners are distracting International from completing its work at the Site which has been International’s top priority.

CONCLUSION

In short, the sampling conducted by the Illinois EPA in response to the Petition was unnecessary. Regardless, the Petition should be denied because it is unsupported by the weight of the evidence and the Petitioners are unable to demonstrate that there is an actual or potential release at the Slips which affects the Petitioners. Moreover, even if the Petition is granted, the Slips should not be dredged. Finally, there are several potentially responsible parties who must be notified if the Petition is granted and any action is required by the USEPA.

EXHIBIT A

INVESTIGATIVE REPORTS REGARDING THE WSW SITE

1. Dames & Moore, Resource Conservation and Recovery Act closure investigation report – “Closure Plan for Wisconsin Steel Works, Chicago, Illinois,” dated March 18, 1988, for the Wisconsin Steel Trust. The Closure Plan includes a proposed sampling plan for the investigation of soil and groundwater at the WSW site. The report also addressed the closure of designated hazardous waste management units.
2. Wang Engineering, Inc., sampling and analysis to support demolition activities being performed at the Site by National Wrecking Company – draft “Report on Sampling and Analysis Program in Support of Demolition Activities, Wisconsin Steel Works Site, Chicago, Illinois,” dated November 1, 1990, for the USACE.
3. USACE, Phase I Remedial Investigation – “Site Characterization Interim Report,” completed in February 1994, was conducted for the EDA under a Memorandum of Agreement signed on April 19, 1991. The Site Characterization Interim Report documented the results of a soil and groundwater investigation done at the WSW site. Over 50 soil borings were completed and 24 monitoring wells were installed. Soil and groundwater samples were analyzed for a comprehensive list of chemical compounds.
4. Administration Building Demolition Technical Memorandum – March 1998: The report, by Geraghty & Miller for Navistar, documents the asbestos removal and building demolition of the Office Building formerly located at 106th Street and Muskegon Avenue, performed in September 1997.
5. Phase II RI Work Plan - August 1998: The Phase II RI Work Plan was prepared by Geraghty & Miller for Navistar to guide the Phase II RI activities at the WSW Site. The primary objective of the Phase II RI was to complete the characterization of the type, magnitude, extent, and migration pathways of contamination at the WSW Site.
6. Plan Acquisition and Review Technical Memorandum- September 17, 1998: This Technical Memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, reported the results of the Plan Acquisition and Review activity, which consisted of reviewing plans of the former WSW and obtaining those deemed pertinent to the Phase II RI and potential remediation activities. The drawings were primarily reviewed for piping, underground storage tanks, and underground structures. This activity also provided a comprehensive background of the Site operations, investigations performed to-date, and the locations of particular facilities.
7. Preliminary Risk Assessment - October 1998: The Preliminary Risk Assessment (RA), prepared by ARCADIS Geraghty & Miller for Navistar, was prepared to focus future investigation activities to be detailed in the Phase II RI Work Plan for the former WSW Site. This document incorporated the rules of Illinois’ SRP (35 Ill. Adm. Code 740) and the Tiered Approach to Corrective Action Objectives (TACO) (35 Ill. Adm. Code 742).

The Preliminary RA provided a Tier 1 evaluation of the Site data gathered and presented in the "Site Characterization Interim Report" through a comparison of constituent levels in soil and groundwater to the Preliminary RA remediation objectives. It also identified specific compounds where additional information was required, such as chromium and arsenic.

8. Chromium Sampling Technical Memorandum - October 5, 1998: This Technical Memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, presented the procedures, evaluation, and conclusions regarding the concentrations of hexavalent chromium at the former WSW Site, based on the on-site chromium sampling.
9. October 1997 Groundwater Sampling Results Technical Memorandum (Groundwater Tech Memo) - October 16, 1998: This Technical Memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, reported the results of the four previous groundwater sampling events and provided recommendations for a monitoring well network at the WSW Site. This comprehensive assessment of historical groundwater monitoring well sampling and hydrogeological conditions at the Site provided the basis for future groundwater investigation, risk assessment, and remedial actions with respect to groundwater.
10. Arsenic Background Sampling Results and Analysis Technical Memorandum - November 19, 1998: This Technical Memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, presented an evaluation and conclusions regarding the concentrations of arsenic detected in area background sampling near the former WSW Site. In conjunction with the Arsenic Addendum, dated February 3, 1999, a preliminary screening level of 18 milligrams per kilogram (mg/kg) was agreed to as a preliminary screening level for Site activities.
11. UST Investigation Technical Memorandum- June 2, 1999: ARCADIS Geraghty & Miller on behalf of Navistar, completed a UST Investigation task at the former WSW Site. The UST field investigation was completed between September 30 and October 8, 1998. The Technical Memorandum describes the physical and geophysical investigations conducted to identify underground storage tanks at the Site.
12. Slag Characterization Results and Analysis Technical Memorandum- July 14, 1999: The data and associated evaluation presented in this technical memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, concluded that the slag can be used as backfill material. Through the chemical analysis, the material in the slag pile was subjected to the same screening process as on-site soils and satisfies the applicable criteria. Based on the analytical results, the subsequent risk assessment, and common slag usage, ARCADIS Geraghty & Miller concluded that the slag may be beneficially used, without restriction, as backfill material.
13. Product Bail-Down Test Results and Analysis Technical Memorandum – December 21, 1999: This technical memorandum, prepared by ARCADIS Geraghty & Miller for Navistar, describes the procedures and results of bail-down tests performed on two areas

of free-product in the Coke Plant Area. This test was performed to provide data needed for development of the remedial action plan for free product.

14. Product Removal Alternatives Assessment and Selection Technical Memorandum– April 17, 2000: This document, prepared by ARCADIS Geraghty & Miller for International, describes the assessment and selection of remedial actions for the free product areas in the Coke Plant Area. The assessment and selection was based on effectiveness, schedule, and cost.
15. Building Demolition Technical Memorandum– June 2000: The report, prepared by ARCADIS Geraghty & Miller for International, documents the asbestos removal and building demolition of the shipping building, security building, and Mill 6 building on the main property, performed in January through May of 2000.
16. Debris Pile Characterization Results and Analysis Technical Memorandum – June 21, 2000: The Debris Pile Characterization technical memorandum, prepared by ARCADIS Geraghty & Miller for International, documented the results of the visual inspection of each of 27 debris piles at the Site, the sampling and chemical analysis of the debris piles, and an asbestos survey as it relates to the debris piles. Following a risk evaluation of the analytical results, the report categorizes each pile as requiring removal, suitable for Site use, or undetermined, pending risk assessment.
17. UST Removal Technical Memorandum – June 28, 2000: This report, prepared by ARCADIS Geraghty & Miller for International, documents the activities associated with the excavation, removal, and disposal of the remaining nine underground storage tanks located at the Site. All underground storage tanks were removed, any liquids were pumped, and the excavation was backfilled according to an approved work plan.
18. Draft Phase II Remedial Investigation Report – August 28, 2000: This report, prepared by ARCADIS Geraghty & Miller for International, documents the results of soil and groundwater investigation activities at the Site to evaluate the risk posed by contamination and to select a remedy. The soil investigation activities included over 300 soil borings and over 800 soil sample analyses of selected constituents. The remedial groundwater investigation included the installation of 23 monitoring wells and one round of groundwater sampling. The Draft Phase II RI Report describes and evaluates the results of these activities in addition to the various other investigations, within the context of historical investigations by USACE. Each successive activity performed complements and builds upon the existing body of Site data. The Draft Phase II RI Report integrates and organizes the sum of Site information into a unified, comprehensive characterization of the Site.
19. Draft Debris Pile Removal Technical Memorandum – November, 2000: This document, prepared by ARCADIS Geraghty & Miller for International, describes the removal of 11 debris piles. Four piles containing asbestos and seven piles considered unsuitable for site use were all removed. The asbestos was removed in accordance with an accepted

Asbestos Removal Work Plan (June 2000). All asbestos observed that was not associated with debris piles was also removed.

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